



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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December 29, 2022

BY ECF

The Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Meta Platforms, Inc. f/k/a Facebook, Inc.*,
22 Civ. 5187 (JGK)

Dear Judge Koeltl:

This Office represents the United States of America (the “Government”) in the above-referenced action. Pursuant to paragraph 5 of the Settlement Agreement and Final Judgment entered in this case on June 27, 2022, Dkt. No. 7 (the “Settlement Agreement”), we write respectfully on behalf of both parties to request a brief extension of the deadline provided in paragraph 5.

The Settlement Agreement provides, among other things, that Meta will build a Variance Reduction System (“VRS”) to reduce variances in the delivery of housing ads that the United States alleges are introduced by Meta’s ad delivery system, for sex and estimated race/ethnicity. *See id.* ¶ 10(a). Pursuant to paragraph 10, the parties shall meet and confer until December 16 “in good faith in an effort to agree on metrics for how much the VRS will reduce any variances” (the “VRS Compliance Metrics”). *Id.* ¶ 10(b). If the parties agree on those metrics: (1) “Meta will implement the VRS by December 31, 2022,” *id.* ¶ 10(d); and (2) the parties “will file a joint notice with the Court by December 31, 2022,” and the term of the Settlement Agreement will extend from an initial term, ending on December 31, 2022 (the “Initial Term”), through an extended term, ending on June 27, 2026, *id.* ¶ 5.

The parties write to advise the Court that the parties have met and conferred as required by paragraph 10(b) and have reached an agreement in principle on the VRS Compliance Metrics. In order to allow the parties adequate time to finalize their understanding, we respectfully request an extension of time, from December 31, 2022, to January 9, 2023, to submit the joint notice required by paragraph 5 of the Settlement Agreement. In the interim, the parties also respectfully request a corresponding extension of the Initial Term of the Settlement Agreement and the VRS Implementation Date from December 31, 2022, to January 9, 2023. This is the first request for such an extension.

Letter to the Hon. John G. Koeltl
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Thank you for your consideration of this matter.

Sincerely,

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